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August 12, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Eric Komitee, U.S.D.J.
225 Cadman Plaza East
Courtroom 6G North
Brooklyn, NY 11201-1804

Re: Williams v. The Russo's Payroll Group, Inc., et al.
Case No.: 1:21-cv-2922 (EK) (CLP)
MLLG File No.: 75-2021

Dear Judge Komitee:

This office represents Defendants The Russo's Payroll Group, Inc. d/b/a Russo's on the Bay (hereinafter "Corporate Defendant"), Frank Russo, Jr. ("Frank"), and Giuseppe "Joe" Vacca¹ ("Giuseppe") (Frank and Giuseppe collectively the "Individual Defendants") (the Corporate Defendant and the Individual Defendants collectively hereinafter the "Defendants") in the above-referenced case.

Defendants write to respectfully request leave to file excess pages of their anticipated letter requesting a pre-motion conference in anticipation of their motion to dismiss the Complaint. Pursuant to ¶ III(B)(1) of this Court's Individual Practices and Rules, such letter motions are not to exceed three (3) pages. Defendants respectfully request leave to file up to four (4) pages, and submit that the additional page requested is necessary to address significant aspects of Defendants' separate arguments in support of their anticipated motion to dismiss, and that same will aid the Court in making a determination on the request.

Accordingly, Defendants respectfully submit that good cause exists for this Court to grant the requested relief.

Defendants thank this honorable Court for its time and attention to this case.

¹ This office does not represent Defendant Robert Russo.

Dated: Lake Success, New York
August 12, 2021

MILMAN LABUDA LAW GROUP PLLC

/s

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Hon. Cheryl L. Pollak, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room 1230
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